

**REMARKS**

Applicant thanks the Examiner for the careful consideration given to this application. Reconsideration is now respectfully requested in view of the amendments above and the following remarks.

Claims 1-4 and 11-18 are pending in this application. Claim 1 is the sole independent claim. Claims 1, 13, and 15 are amended. Claims 5-10 were previously cancelled without prejudice or disclaimer. New Claims 17 and 18 are added. Reconsideration and allowance of the present application are respectfully requested.

**Allowable Subject Matter**

Applicant notes with appreciation the Examiner's indication that Claim 13 contains allowable subject matter.

**Claim Rejections under 35 U.S.C. §112**

Claim 13 stands rejected under 35 USC §112, second paragraph, as being indefinite. This rejection is respectfully traversed in view of the amendments made to Claim 13, which, Applicant respectfully submits, address this rejection.

Therefore, Applicants respectfully request that the rejection of Claim 13 under 35 U.S.C. §112 be withdrawn.

**Claim Rejections under 35 U.S.C. §102**

Claims 1, 2, 14 and 15 stand rejected under 35 U.S.C. §102(b) as being anticipated by U.S. Patent Publication No. 2002/0154145 to Isakovic et al. (hereinafter "Isakovic et al."). This rejection is respectfully traversed for at least the following reasons.

Independent Claim 1 recites in part, "at least a first driver circuit interacting with a memory and configured for controlling the at least one DMD." The Office Action alleges that Figure 6, Items 22 and 104 of Isakovic et al. correspond to this element of Claim 1. Office Action at 4. Item 22 is described in Isakovic et al. as corresponding to a "graphics computer," while Item 104 is stated as being "image data intermediate memory." Isakovic et al., e.g., at

paragraphs 109 and 207. As shown in Figure 6 of Isakovic et al., graphics computer 22 is coupled to image data intermediate memory 104, which is, in turn, along with another image data intermediate memory 106, coupled to an input of change-over switch 108. Isakovic et al. at Figure 6 and paragraphs 207-208. At paragraph 208, Isakovic et al. further explains, “At one time, either the image data contained in the image data intermediate memory 104 or the image data contained in the image data intermediate memory 106 can be outputted by way of the image data output. That is indicated...by a change-over switch 108.” Isakovic et al. at paragraph 208. Isakovic et al. further discusses, “Control of image data output by the partial image switching unit 102 is effected by the switching control unit 110[,] which is connected to a signal input of the partial image switching unit 102 and...is integrated together with the graphics computing unit 98 into a synchronization module 111.” Isakovic et al. at paragraph 210. Note that the graphics computing unit 98 is connected to light image projector 20. Isakovic et al. at Figure 6 and paragraph 209. Therefore, there is no control function or connection disclosed in Isakovic et al. between the graphics computer 22/image data intermediate memory 104 and projector 20 or any DMD. Hence, Isakovic et al. fails to disclose at least “a first driver circuit...configured for controlling the at least one DMD,” as recited in Claim 1.

For at least these reasons, Applicant respectfully submits that the Office Action fails to establish a *prima facie* case that Isakovic et al. anticipates Claim 1 or Claims 2, 14, and 15, which depend from Claim 1. Therefore, Applicant respectfully requests that this rejection of Claims 1, 2, 14 and 15 under 35 U.S.C. §102 be withdrawn.

#### **Claim Rejections Under 35 U.S.C. §103**

Claims 3, 4, 11, 12 and 16 stand rejected under 35 U.S.C. §103(a) as being unpatentable over U.S. Patent Publication No. 2002/0154145 to Isakovic et al. (hereinafter “Isakovic et al.”). This rejection is respectfully traversed for at least the following reasons.

The Office Action relies upon the same features discussed with respect to the alleged anticipation of Claims 1 et al. by Isakovic et al. in these rejections and presents no further references or arguments that would overcome the deficiencies discussed above. Therefore, the above arguments are also applicable to these rejections of Claim 3, 4, 11, 12, and 16, and it is

respectfully submitted that the Office Action fails to establish a *prima facie* case that these claims are unpatentable over Isakovic et al.

Therefore, Applicant respectfully requests that this rejection of Claims 3, 4, 11, 12 and 16 under 35 U.S.C. §103 be withdrawn.

#### **New Claims**

New Claims 17 and 18 have been added. It is respectfully submitted that these new claims are supported by the specification as originally filed. Furthermore, these claims depend, either directly or indirectly, from Claim 1, and therefore, the above arguments are also applicable to these claims.

#### **Disclaimer**

Applicant may not have presented all possible arguments or have refuted the characterizations of either the claims or the prior art as found in the Office Action. However, the lack of such arguments or refutations is not intended to act as a waiver of such arguments or as concurrence with such characterizations.

**CONCLUSION**

In view of the above, consideration and allowance are respectfully solicited.

In the event the Examiner believes an interview might serve in any way to advance the prosecution of this application, the undersigned is available at the telephone number noted below.

The Office is authorized to charge any necessary fees to Deposit Account No. 22-0185.

Applicant believes no fee is due with this response other than such fees as may be indicated in one or more accompanying papers. However, if a fee is due (including if such paper(s) is/are inadvertently omitted), please charge our Deposit Account No. 22-0185, under Order No. 22407-00047-US, from which the undersigned is authorized to draw. Furthermore, if any extension of time is necessary, such extension of time is hereby requested.

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Respectfully submitted,

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